

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE CHICAGO BRIDGE & IRON )  
COMPANY N.V. SECURITIES LITIGATION ) Hon. Lorna Schofield  
)

**PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES  
AND COMPENSATORY AWARDS FOR PLAINTIFFS**

## KAHN SWICK & FOTI, LLC

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Union Security Funds and Iron  
Workers Local 580 – Joint Funds*

Lead Plaintiff ALSAR Ltd. Partnership (“ALSAR”) and additional Plaintiffs Iron Workers Local 40, 362, & 417 – Union Security Funds and Iron Workers Local 580 – Joint Funds (“Iron Workers” and collectively with ALSAR, “Class Representatives” or “Plaintiffs”), through their undersigned counsel (Lead Counsel Kahn, Swick & Foti LLC (“KSF”) and Additional Counsel Pomerantz LLP (“Pomerantz,” and together with Lead Counsel, “Plaintiffs’ Counsel”)), respectfully move this Court for an Order: (1) awarding Plaintiffs’ Counsel attorneys’ fees of one-third (33 <sup>1/3</sup>%) of the total recovery of \$44,000,000, plus accrued interest; (2) reimbursing Plaintiffs’ Counsel’s reasonable and necessary litigation expenses in the amount of \$3,462,683.78, plus accrued interest; and (3) awarding compensatory awards of \$60,000 to ALSAR, \$25,000 to Iron Workers Local 40, 362, & 417 – Union Security Funds, and \$20,000 to Iron Workers Local 580 – Joint Funds. In support thereof, Plaintiffs file the accompanying Memorandum of Law and Declaration of Kim E. Miller. A [Proposed] Order with respect to both this Motion and the Motion for Final Approval of Class Action Settlement will be attached to reply papers, so that it can be adjusted after the exclusion deadline to reflect parties seeking exclusion.

DATED: June 27, 2022

Respectfully submitted,

**KAHN SWICK & FOTI, LLC**

*/s/ Kim E. Miller*  
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– Joint Funds and the Class*

**CERTIFICATE OF SERVICE**

I hereby certify that I caused a copy of the foregoing Plaintiffs' Motion for an Award of Attorneys' Fees and Expenses and Compensatory Awards on Defendants on June 27, 2022 via CM/ECF.

/s/ Kim E. Miller  
Kim E. Miller